

# DEFENCE COMPANIES INDEX (DCI) ON ANTI-CORRUPTION AND CORPORATE TRANSPARENCY 2020

## FINAL ASSESSMENT

### HYUNDAI ROTEM COMPANY LIMITED

The following pages contain the detailed scoring for this company based on publicly available information.

The table below shows a summary of the company's scores per section:

Section	Number of Questions*	Score Based on Publicly Available Information
1. Leadership and Organisational Culture	4	0/8
2. Internal Controls	6	1/12
3. Support to Employees	7	2/14
4. Conflict of Interest	4	1/8
5. Customer Engagement	7	1/14
6. Supply Chain Management	5	1/10
7. Agents, Intermediaries and Joint Ventures	10	0/20
8. Offsets	4	0/8
9. High Risk Markets	4	0/8
10. State-Owned Enterprises	0	N/A
<b>TOTAL</b>		<b>6 / 102</b>
<b>BAND</b>		<b>F</b>

\*This column represents the number of questions on which the company was eligible to receive a score; i.e. where the company did not receive a score of N/A.

## 1. Leadership and Organisational Culture

<b>Question</b>
<b>1.1. Does the company have a publicly stated anti-bribery and corruption commitment, which is authorised by its leadership?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is evidence that the company has a publicly stated commitment to ethics. However, the company receives a score of '0' because there is no evidence that this commitment is not authorised or supported by a senior figure. The company's statement also does not make specific reference to anti-bribery and corruption.
<b>Evidence</b>
<p><b>[1] Code of Ethics Practice (Webpage)</b>                  Accessed 11/11/2019  <a href="https://ethics.rotem.co.kr/en/ethical/doctrine.asp">https://ethics.rotem.co.kr/en/ethical/doctrine.asp</a></p> <p>We, Hyundai Rotem employees, recognize that ethics is a source of corporate competitiveness and promise that</p> <p>Hyundai Rotem will actively participate in the realization of ethical charter spirit so that it can be trusted by the people. Therefore, we promise as below.</p> <p><b>01. We</b>                  contribute to national economic development through continuous employment creation and sincere tax payment.</p> <p><b>02. We</b>                  are committed to protecting the environment by strictly observing environmental regulations and contributing to society through culture and welfare projects.</p> <p><b>03. We</b>                  will take lead in creating a sound corporate culture that is faithful to the principles and basics by strictly observing all related laws and corporate management policies in carrying out given tasks.</p> <p><b>04. We</b>                  protect customer information carefully, tell the truth to the customer, and fulfill the promise with the customer.</p> <p><b>05. We</b>                  do not accept any form of interest that could impair fairness in relation to our duties. We do not accept from our stakeholders, and we firmly refuse to ask for unfair business practices and duties using our authority.</p> <p><b>06. We</b>                  protect business secrets and avoid any conduct or relationship that conflicts with the interests of company and individual.</p> <p><b>07. We</b>                  try to achieve pride and reward by doing our best in our duties with responsibility, and strive to contribute to national, social and company development through constant self-development.</p>

<b>Question</b>								
<p><b>1.2. Does the company have a comprehensive anti-bribery and corruption policy that explicitly applies to both of the following categories:</b></p> <p><b>a) All employees, including staff and leadership of subsidiaries and other controlled entities;</b></p> <p><b>b) All board members, including non-executive directors.</b></p>								
<b>Score</b>								
<b>0</b>								
<b>Comments</b>								
<p>There is evidence that the company has ethical guidelines for its employees that includes a compliance manual on fair trade, which refers to some of the risk areas related to bribery and corruption. However, the company receives a score of '0' because this document does not make explicit reference to anti-bribery and corruption, and there is no evidence that any of the company's other publicly available information outlines anti-bribery and corruption policies for its employees or board members.</p>								
<b>Evidence</b>								
<p><b>[1] Code of Ethics Practice (Webpage)</b>                  Accessed 11/11/2019  <a href="https://ethics.rotem.co.kr/en/ethical/doctrine.asp">https://ethics.rotem.co.kr/en/ethical/doctrine.asp</a></p> <p>We, Hyundai Rotem employees, recognize that ethics is a source of corporate competitiveness and promise that</p> <p>Hyundai Rotem will actively participate in the realization of ethical charter spirit so that it can be trusted by the people. Therefore, we promise as below.</p> <table border="0" style="width: 100%;"> <tr> <td style="width: 50%; vertical-align: top;"> <p><u>01. We</u> contribute to national economic development through continuous employment creation and sincere tax payment.</p> </td> <td style="width: 50%; vertical-align: top;"> <p><u>02. We</u> are committed to protecting the environment by strictly observing environmental regulations and contributing to society through culture and welfare projects.</p> </td> </tr> <tr> <td style="width: 50%; vertical-align: top;"> <p><u>03. We</u> will take lead in creating a sound corporate culture that is faithful to the principles and basics by strictly observing all related laws and corporate management policies in carrying out given tasks.</p> </td> <td style="width: 50%; vertical-align: top;"> <p><u>04. We</u> protect customer information carefully, tell the truth to the customer, and fulfill the promise with the customer.</p> </td> </tr> <tr> <td style="width: 50%; vertical-align: top;"> <p><u>05. We</u> do not accept any form of interest that could impair fairness in relation to our duties. We do not accept from our stakeholders, and we firmly refuse to ask for unfair business practices and duties using our authority.</p> </td> <td style="width: 50%; vertical-align: top;"> <p><u>06. We</u> protect business secrets and avoid any conduct or relationship that conflicts with the interests of company and individual.</p> </td> </tr> <tr> <td style="width: 50%; vertical-align: top;"> <p><u>07. We</u> try to achieve pride and reward by doing our best in our duties with responsibility, and strive to contribute to national, social and company development through constant self-development.</p> </td> <td></td> </tr> </table> <p><b>[4] Ethical Behaviour Q&amp;A (Webpage)</b>                  Accessed 11/11/2019  <a href="https://ethics.rotem.co.kr/en/ethical/qna.asp">https://ethics.rotem.co.kr/en/ethical/qna.asp</a>                  Carrying out a transparent and fair job</p>	<p><u>01. We</u> contribute to national economic development through continuous employment creation and sincere tax payment.</p>	<p><u>02. We</u> are committed to protecting the environment by strictly observing environmental regulations and contributing to society through culture and welfare projects.</p>	<p><u>03. We</u> will take lead in creating a sound corporate culture that is faithful to the principles and basics by strictly observing all related laws and corporate management policies in carrying out given tasks.</p>	<p><u>04. We</u> protect customer information carefully, tell the truth to the customer, and fulfill the promise with the customer.</p>	<p><u>05. We</u> do not accept any form of interest that could impair fairness in relation to our duties. We do not accept from our stakeholders, and we firmly refuse to ask for unfair business practices and duties using our authority.</p>	<p><u>06. We</u> protect business secrets and avoid any conduct or relationship that conflicts with the interests of company and individual.</p>	<p><u>07. We</u> try to achieve pride and reward by doing our best in our duties with responsibility, and strive to contribute to national, social and company development through constant self-development.</p>	
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Q My uncle was hired by a supplier I manage this time. I often come across with him at the company and he naturally requests to extend deadline, increase price, etc. What should I do?  
 A If it is difficult to perform a fair job, consult with the team leader or the Human Resources Team about whether or not to avoid the job.

Q We are short of available cabinets. Is it ok to dispose the files from 2~3 years ago?  
 A When disposing data, it should be disposed after gaining prior approval from the team leader. The information related to decision making such as selection review of distributors or suppliers should not be disposed without permission.

Q If there are in-house events such as athletic meet, climbing, etc., there is a case where we receive donated goods (goods, drinks, liquor, etc.) from trading companies. Is this not allowed in ethical behavior?  
 A Receiving donations from trading companies is a violation of ethical conduct guidelines. If you receive donations, you must explain the purpose of company's ethical management and return them. You should settle down with practices that hold simple events within company's budget. In particular, you should not intentionally talk to the trading company and give burden of giving donated goods.

Q I visited a jurisdictional service partner with whom I was familiar with the car accident and asked for repair, but the company changed the parts for free. Is it a violation of ethical behavior guidelines?  
 A The fact that the service provider has made the exchange of parts free of charge may be regarded as the influence of the dominant position, and therefore the normal cost of parts replacement and repair must be paid.

Q During the holidays, the team leader handed out gift certificates he/she received from trading company to the employees. I do not know what kind of trading company it was from, and I can not refuse it because it is given by the team leader. Is it ok to accept it?  
 A If a team leader receives a gift certificate from a trading company and gives it to an employee, the team leader violated the Ethics Guidelines. However, employees who receive them are also in violation of the Ethical Conduct Guidelines, so you should report them to the General Affairs Team or the Human Resources Team.

**[5] Ethical Behaviour Guidelines (Webpage)**

Accessed 11/11/2019

<https://ethics.rotem.co.kr/en/ethical/qindex.asp>

Hyundai Rotem employees will practice and keep ethical management.

As one of the recent issues related to global standard companies, there is a saying which says, 'ethical management is no longer an option but a necessary element for survival.' As a true global company, our company has been striving to establish transparent ethical management for continuous growth.

As an employee of the company, in order to establish transparent ethical management, I believe that it is important to establish ethical and moral values standards and actively implement them.

The ethics site and practice code of the employees and the ethics regulations of the workplace are financially set and operated but the content is comprehensive, and it is somewhat lacking for a specific criterion for ethics and moral behavior.

The <Guidelines for Employee Ethics Conduct> provides specific guidelines on "what to do" and "what not to do" centered on universal cases that can happen during daily job duties and daily life. We have made it possible for you and employees to use this information as a practical guide to ethical and moral judgment.

We hope that this handbook can help employees raise awareness and practice transparent ethical management. We look forward to your continued interest and dedication to establishing transparent ethics management.

**[6] Guidelines for Employee Ethics (Webpage)**

Accessed 11/11/2019

<https://ethics.rotem.co.kr/en/ethical/guide.asp>

Carrying out transparent and fair job

01. Treat all customers equally without discrimination, and perform duties clearly and transparently.

- 1) If it is difficult to perform your job fairly due to interest conflict of yourself(or your relative), you should consult your supervisor or human resources team about whether you should avoid the job or not.
- 2) You should not give preferential treatment to a specific person for reasons such as regional, blood, school relations, etc.
- 3) All information related to the decision-making should be recorded or preserved up to the date of preservation by data, and should not be lost, damaged or concealed without permission.
- 4) Decision-making documents should not use ambiguous terms, and must be accompanied by rules of conduct and cooperation from the relevant sector.
- 5) You should comply with legal and regulatory responsibilities in business conduct and business relationships. You should not make false requests, and do not engage in unethical practices such as quality tampering of the product or contract.

02. Improper instructions that impair the fairness of job performance should not be followed.

- 1) Employees must maintain basic courtesies necessary for each other's work life. Superiors should not give unfair work or pressure by using superior position.
- 2) If it is an instruction that impedes the performance of a fair job, the subordinate should explain to the superior for such injustice, but if the injustice does not improve or if the individual is disadvantaged, he or she should consult the superior or the human resources team.

03. Employees should not take unfair demands or receive compensation from stakeholders for their business superiority or dominant position.

- 1) Should not make unreasonable demands on stakeholders by taking advantage of their superior position in the business.
  - Requesting expenses such as dinner expenses, golf expenses, travel expenses, etc., and requests for reimbursement for credit cards, foreign currency loans, subrogation, etc.
  - Personnel solicitation, sales of goods, insurances, participation of multi-level companies, demand for borrowing of bonds, etc.
- 2) Should not lead unfair consideration from suppliers by deliberate delays
- 3) No sponsorship should be requested or provided to stakeholders at the event. Pre-notification of the event should be prohibited as it is considered to be an intentional act to receive sponsorship.
- 4) Should not ask for free parts excessive discounts from suppliers when other purchasing other items or parts.
- 5) You should not imply or claim that you will provide unfair advantage by using weaknesses or deficiencies of stakeholders.

## Business Ethics

1. Live only within your budget. Do not get used to fancy restaurants or bars. Match your lifestyle according to your salary.
2. If you think you can't live within your salary, then quit working and start a business. It is better than going bankrupt later.
3. Never have loans that are more than 3 times your monthly salary.
4. Avoid standing surety for a loan. If you must, limit them to your direct family members.
5. Making inappropriate relationships is the same as corruption.
6. Avoid gambling and speculative stock investment.
7. Build a habit of paying for yourself, even if it is a very close relationship.
8. Do not try to be overly friendly and become friends with everyone.
9. Learn and practice how to refuse requests from others.

### [2] Ethical Charter (Webpage)

Accessed 11/11/2019

<https://ethics.rotem.co.kr/en/ethical/constitution.asp>

#### 05. Establishment of Transparent/Ethical Management

We process all our business by transparent standards and maintain a fair trade relationship with all business partners including customers and vendors to ensure mutual benefits in transparent terms of trade, thereby establishing an honest corporate culture trusted by the public.

We dismiss all inquiries from all stakeholders that may impair fairness in relation to our duties, and we do not receive any unfair advantage.

**[21] Fair Trade Compliance Manual (Document)**

Accessed 12/11/2019

[https://ethics.rotem.co.kr/\\_lib/download.asp?path=board&downfile=%EA%B3%B5%EC%A0%95%EA%B1%B0%EB%9E%98%EC%9E%90%EC%9C%A8%EC%A4%80%EC%88%98%ED%8E%B8%EB%9E%8C%282013%EB%85%84%29%2Epdf](https://ethics.rotem.co.kr/_lib/download.asp?path=board&downfile=%EA%B3%B5%EC%A0%95%EA%B1%B0%EB%9E%98%EC%9E%90%EC%9C%A8%EC%A4%80%EC%88%98%ED%8E%B8%EB%9E%8C%282013%EB%85%84%29%2Epdf)

[p.iv]

**행 동 규 범**

현대로템의 모든 임직원은 다음과 같이 공정거래 자율준수 행동규범을 철저히 이행하여 자유로운 경쟁을 촉진함으로써 창의적인 기업환경을 조성하고, 협력업체와의 상생 경영을 실천하며, 공정성과 투명성을 통한 윤리경영으로 기업가치를 높이며 국가발전 에 기여한다.

공정한 거래를 부당하게 저해하는 어떠한 행위도 하지 않는다.

- 부당하게 거래를 거절하거나 거래상대방을 차별하는 행위
- 부당하게 경쟁자를 배제하는 행위
- 부당하게 다른 사업자의 사업활동을 방해하는 행위
- 거래상 지위를 부당하게 이용하여 상대방과 거래하는 행위
- 거래상대방의 사업활동을 부당하게 구속하는 조건으로 거래하는 행위

올바른 윤리관으로 개개인과 회사의 품위를 훼손하는 어떠한 행위도 하지 않는다.

- 금품 및 향응 제공하거나 받는 행위
- 협력업체 임직원에게 청탁이나 압력을 행사하는 행위
- 회사 업무와 관련해 입수한 정보를 개인의 이익을 위해 이용하는 행위
- 업무수행에 있어 상호간 예의를 갖추지 않는 행위
- 상호업무 수행 시 업무지연으로 상대방에 피해를 주는 행위

회사의 업무를 수행함에 있어 본 행동규범이나 공정거래 관련 법규의 위반 가능성 등 의문이 발생하거나, 법규준수와 회사의 목표를 달성하려는 노력 사이에 상충되는 문 제가 발생하는 경우에는 자율준수관리자와 공정거래 자율준수 담당부서(재경팀)와 상 의한다.

자율준수 담당조직 연락처			
자율준수 관리자	서성호 이사	TEL	02-3464-7500
자율준수 담당자	손석우 부장	TEL	02-3464-7090
	권오현 차장	TEL	02-3464-7098

[p.252] 제 1 장 총칙

제 1조 (목적)

이 규정은 임직원들이 공정거래관련법규(이하 경쟁법)의 준수를 위하여 준수하여야 할 기본적인 절차와 기준을 규정하는데 그 목적이 있다.

**Translation:**

[p. iv] Code of Conduct

All employees of Hyundai Rotem create a creative business environment by promoting free competition by thoroughly implementing the following rules of conduct in self-compliance with fair trade, practice win-win management with suppliers, enhance corporate value through the ethics of fairness and transparency, and contribute to national development.

Do not do anything that unfairly undermines fair trade.

[...]

Do not do anything that impairs the dignity of an individual or a company with the correct ethics.



The act of offering or receiving money and entertainment.  
An act of soliciting or exerting pressure on employees of subcontractor;  
The act of using information obtained in connection with the company's business for personal gain;

[...]

In the event that questions arise, such as the possibility of violation of this code of conduct or fair trade related regulations, or conflicts arise between compliance with regulations and efforts to achieve the goals of the company, the self-compliance manager and the department in charge of fair trade compliance (financial team).

[p.252] Chapter 1 General Rules

Article 1 (Objectives)

The purpose of this regulation is to prescribe the basic procedures and standards that executives and employees must comply with in order to comply with the Fair Trade Act.

<b>Question</b>				
<b>1.3. Does the board or a dedicated board committee provide oversight of the company's anti-bribery and corruption programme?</b>				
<b>Score</b>				
<b>0</b>				
<b>Comments</b>				
<p>There is evidence that a designated board committee – the Ethics Committee – oversees the company's compliance programme. However, there is no evidence to suggest that the compliance programme includes a focus on bribery and corruption. In addition, there is no clear evidence that the committee engages in formal oversight functions such as reviewing reports from management or the results of internal and external audits of an anti-bribery and corruption programme.</p>				
<b>Evidence</b>				
<p><b>[7] Management and Board of Directors (Webpage)</b>                  Accessed 11/11/2019  <a href="https://www.hyundai-rotem.co.kr/Eng/InvestInfo/Management/BoardDirectors.asp">https://www.hyundai-rotem.co.kr/Eng/InvestInfo/Management/BoardDirectors.asp</a>                  Sub-Committees</p>				
Committee	Members		Major Roles	Remarks
	Internal	External		
Audit Committee	-	Tae-hak Chung, Won-hee Lee, Sang-gyung Jun,	<ul style="list-style-type: none"> <li>• Audit of Accounting and Business operations</li> <li>• Requiring a report onto the director regards with the business</li> <li>• Monitoring the business and the asset status</li> <li>• Approval of appointment and dismissal for the independent auditor</li> </ul>	-
Ethics Committee	-	Hyung-koo Yeo, Tae-hak Chung, Won-hee Lee,	<ul style="list-style-type: none"> <li>• Approval of the internal transaction with the affiliates</li> <li>• Monitoring the Compliance Program</li> </ul>	-
Non-Executive Director Candidate Recommendation Committee	Geon-yong Lee	Sang-gyung Jun, Hyung-koo Yeo	<ul style="list-style-type: none"> <li>• Recommends and reviewing the candidate for the Non-Executive Director</li> </ul>	-




<b>Question</b>
<b>1.4. Is responsibility for implementing and managing the company’s anti-bribery and corruption programme ultimately assigned to a senior executive, and does he or she have a direct reporting line to the board or board committee providing oversight of the company’s programme?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
Based on publicly available information, there is no evidence that a senior individual is ultimately responsible for implementing and managing the company’s anti-bribery and corruption programme. Although there is evidence that the company has a Compliance Officer, there is no publicly available evidence to suggest that their responsibilities include oversight of anti-bribery and corruption.
<b>Evidence</b>
<p><b>[21] Fair Trade Compliance Manual (Document)</b>                  Accessed 12/11/2019  <a href="https://ethics.rotem.co.kr/lib/download.asp?path=board&amp;downfile=%EA%B3%B5%EC%A0%95%EA%B1%B0%EB%9E%98%EC%9E%90%EC%9C%A8%EC%A4%80%EC%88%98%ED%8E%B8%EB%9E%8C%282013%EB%85%84%29%2Epdf">https://ethics.rotem.co.kr/lib/download.asp?path=board&amp;downfile=%EA%B3%B5%EC%A0%95%EA%B1%B0%EB%9E%98%EC%9E%90%EC%9C%A8%EC%A4%80%EC%88%98%ED%8E%B8%EB%9E%8C%282013%EB%85%84%29%2Epdf</a></p> <p>[p.252] 제 1 장 총칙                  제 1조 (목적)                  이 규정은 임직원들이 공정거래관련법규(이하 경쟁법)의 준수를 위하여 준수하여야 할 기본적인 절차와 기준을 규정하는데 그 목적이 있다.</p> <p>[...]</p> <p>제2장 조직구조 및 업무분장                  제 1절 자율준수관리자                  제4조(선임과 해임)                  자율준수관리자의 선임 및 해임은 이사회에서 승인되어야 한다.</p> <p>[p.253] 제 5조 (권한)                  자율준수관리자의 권한은 다음 각 호와 같다.</p> <ol style="list-style-type: none"> <li>1. 자율준수 실태에 대한 점검, 조사권</li> <li>2. 경쟁법을 위반한 사항에 대한 개선, 시정요구권</li> </ol> <p><b>Translation:</b></p> <p>[p.252] Chapter 1 General Rules                  Article 1 (Objectives)                  The purpose of this regulation is to prescribe the basic procedures and standards that executives and employees must comply with in order to comply with the Fair Trade Act.</p> <p>[...]</p> <p>Chapter 2 Organizational Structure and Business Divisions                  Section 1 Compliance Officer                  Article 4 (Selection and dismissal)                  The appointment and dismissal of the Compliance Officer shall be approved by the Board of Directors.</p> <p>[p.253] Article 5 (Authority)                  The authority of the Compliance Officer is as follows:</p> <ol style="list-style-type: none"> <li>1. The right to inspect and investigate compliance situations</li> </ol>

2. Improvement of Fair-Trade Act violations, right to request correction

## 2. Internal Controls

<b>Question</b>
<b>2.1. Is the design and implementation of the anti-bribery and corruption programme tailored to the company based on an assessment of the corruption and bribery risks it faces?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no publicly available evidence that the company has a formal risk assessment procedure which is used to inform the company's anti-corruption or compliance programme.
<b>Evidence</b>
No evidence found.

<b>Question</b>
<b>2.2. Is the company's anti-bribery and corruption programme subject to regular internal or external audit, and are policies and procedures updated according to audit recommendations?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no publicly available evidence that the company's ethics, compliance or anti-bribery and corruption programme is subject to audit or review.
<b>Evidence</b>
No evidence found.

<b>Question</b>
<b>2.3. Does the company have a system for tracking, investigating and responding to bribery and corruption allegations or incidents, including those reported through whistleblowing channels?</b>
<b>Score</b>
<b>1</b>
<b>Comments</b>
<p>Based on publicly available information, there is some evidence that the company commits to investigating incidents, and there is a specific procedure in place to deal with whistleblowing cases. The company stipulates actions to be taken at each step and indicates that whistleblowers can check on the outcome of the investigation.</p> <p>However, the company scores '1' as this does not cover the whole investigation process from receipt to final outcome. There is no evidence that investigations are handled by an independent team or reported to an independent board member. There is also no evidence that the information on each investigation is documented with summary information on investigations reviewed by a central body on a quarterly basis. In addition, it is noted that the company's investigative procedure as outlined in publicly available information relates only to reports received through whistleblowing channels.</p>
<b>Evidence</b>
<p><b>[8] Cyber Journal - Introduction (Webpage)</b>                  Accessed 11/11/2019  <a href="https://ethics.rotem.co.kr/en/cyber/about.asp">https://ethics.rotem.co.kr/en/cyber/about.asp</a></p> <p style="text-align: center;"><b>What is Cyber Journal?</b></p> <p>It is an online appreciation system, where employees, business partners, and customers will be notified via Internet of transaction practices related to the Company, various irregularities, irregularly related irregularities, violations of fair trade laws, unreasonable system improvement,</p> <p><b>01. Operation of Cyber Journal</b></p> <p>You can report any unfair act, unlawful corruption, presidential election, etc. on the Internet and check the processing results..</p> <p>[...]</p> <p><b>03. Reporting Process</b></p>  <p><b>[21] Fair Trade Compliance Manual (Document)</b>                  Accessed 12/11/2019  <a href="https://ethics.rotem.co.kr/lib/download.asp?path=board&amp;downfile=%EA%B3%B5%EC%A0%95%EA%B1%B0%EB%9E%98%EC%9E%90%EC%9C%A8%EC%A4%80%EC%88%98%ED%8E%B8%EB%9E%8C%282013%EB%85%84%29%2Epdf">https://ethics.rotem.co.kr/lib/download.asp?path=board&amp;downfile=%EA%B3%B5%EC%A0%95%EA%B1%B0%EB%9E%98%EC%9E%90%EC%9C%A8%EC%A4%80%EC%88%98%ED%8E%B8%EB%9E%8C%282013%EB%85%84%29%2Epdf</a></p> <p>[p.256] 제17조(내부고발보호시스템)</p> <p>1. 자율준수관리자는 다음 각 호에 해당하는 방법에 의하여 내부고발 프로그램을 실시하며 프로그램의 작동여부를 정비 모니터링 시 확인해야 한다.</p> <p>(1) 공정거래 hot line                  (2) 사이버신문고                  (3) 자율준수관리자 면담                  (4) 대표이사 제보메일</p>

- 2. 자율준수관리자는 내부고발 프로그램을 통한 제보자의 신원 및 익명성을 보장해야 한다.
- 3. 자율준수 관리자는 제보 후에도 6개월 이상 주기적으로 제보자와의 면담을 통해 제보자의 신상정보에 책임을 진다.

[p.260] 4. Hot line(내부감시제도)

[...]

신고하신 내용은 제보자가 안심하고 참여할 수 있도록 제보자 보호 프로그램을 운영하고 있습니다 (비밀보장, 신분보장, 책임감면)

**Translation:**

[p.256] Article 17 (Internal Whistleblowing Protection System)

- 1. The Compliance Officer shall carry out the whistleblowing programme in accordance with the following methods and shall check the operation of the programme through its monitoring.
  - (1) Fair Trade Hot Line
  - (2) Online Whistle-blowing system
  - (3) In-person interview with the Compliance Officer
  - (4) Reporting e-mail to the CEO
- 2. The Compliance Officer shall ensure the identity and anonymity of informants through the internal complaint programme.
- 3. The Compliance Officer shall be responsible for the informant's personal information through regular meetings with the informer for at least six months after the report.

[p.260] 4. Hot line (internal monitoring system)

[...]

The company operates a whistleblowing protection programme to ensure that informants can participate in making reports with confidence (confidentiality, anonymity, decrease liability).

<b>Question</b>
2.4. Does the company have appropriate arrangements in place to ensure the quality of investigations?
<b>Score</b>
0
<b>Comments</b>
There is no publicly available evidence that the company assures itself of the quality of its internal investigations.
<b>Evidence</b>
No evidence found.



<b>Question</b>
<b>2.5. Does the company's investigative procedure include a commitment to report material findings of bribery and corruption to the board and any criminal conduct to the relevant authorities?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no publicly available evidence that the company's investigative procedure includes a commitment to report material findings to the board or the relevant authorities.
<b>Evidence</b>
No evidence found.

<b>Question</b>
<b>2.6. Does the company publish high-level results from incident investigations and disciplinary actions against its employees?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no publicly available evidence that the company publishes any data on ethical or bribery and corruption investigations or disciplinary actions involving its employees.
<b>Evidence</b>
No evidence found.

### 3. Support to Employees

<b>Question</b>
3.1. Does the company provide training on its anti-bribery and corruption programme to all employees across all divisions and geographies, and in all appropriate languages?
<b>Score</b>
0
<b>Comments</b>
There is no publicly available evidence that the company provides ethics, compliance or anti-bribery and corruption training to its employees.
<b>Evidence</b>
No evidence found.


<b>Question</b>
<p><b>3.2. Does the company provide tailored training on its anti-bribery and corruption programme for at least the following categories of employees:</b></p> <ul style="list-style-type: none"> <li>a) Employees in high risk positions,</li> <li>b) Middle management,</li> <li>c) Board members.</li> </ul>
<b>Score</b>
0
<b>Comments</b>
<p>There is no publicly available evidence that the company tailors its anti-bribery and corruption training to employees based on an assessment of their role and exposure to corruption risk.</p>
<b>Evidence</b>
<p>No evidence found.</p>

<b>Question</b>
<b>3.3. Does the company measure and review the effectiveness of its anti-bribery and corruption communications and training programme?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no publicly available evidence to indicate that the company measures or reviews the efficacy of its anti-bribery and corruption communications or training programme.
<b>Evidence</b>
No evidence found.

<b>Question</b>
<b>3.4. Does the company ensure that its employee incentive schemes are designed in such a way that they promote ethical behaviour and discourage corrupt practices?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no publicly available evidence that the company’s incentive schemes incorporate ethical or anti-bribery and corruption principles.
<b>Evidence</b>
No evidence found.

<b>Question</b>
<b>3.5. Does the company commit to and assure itself that it will support and protect employees who refuse to act unethically, even when it might result in a loss of business?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no publicly available evidence to indicate that the company commits to support or protect employees who refuse to act unethically, even when it might result in a loss of business.
<b>Evidence</b>
No evidence found.



<b>Question</b>
<b>3.6. Does the company have a clear policy of non-retaliation against whistleblowers and employees who report bribery and corruption incidents?</b>
<b>Score</b>
<b>1</b>
<b>Comments</b>
<p>There is some evidence that the company promotes a policy of non-retaliation against whistleblowers who report bribery and corruption incidents through its whistleblowing channel. There is evidence that the company’s whistleblowing channel is open to third parties including business partners, and the company indicates that its non-retaliation policy extends to these entities.</p> <p>However, the company receives a score of ‘1’ because there is no evidence that it assures itself of its employees’ confidence in this commitment through surveys, usage data or other clearly stated means.</p>
<b>Evidence</b>
<p><b>[9] Cyber Journal – Informant Protection Program (Webpage)</b>                  Accessed 11/11/2019  <a href="https://ethics.rotem.co.kr/en/cyber/program.asp">https://ethics.rotem.co.kr/en/cyber/program.asp</a></p> <div style="text-align: center;"> <p><b>Cyber Journal</b></p> <p>We have a program to protect identity of informants so that they can participate with confidence.</p>  <p><b>Identity Guarantee</b>                      We protect against disadvantages that may be caused by reports or statements..</p> </div> <p><b>[8] Cyber Journal - Introduction (Webpage)</b>                  Accessed 11/11/2019  <a href="https://ethics.rotem.co.kr/en/cyber/about.asp">https://ethics.rotem.co.kr/en/cyber/about.asp</a></p> <div style="text-align: center;"> <p><b>What is Cyber Journal?</b></p> <p>It is an online appreciation system, where employees, business partners, and customers will be notified via Internet of transaction practices related to the Company, various irregularities, irregularly related irregularities, violations of fair trade laws, unreasonable system improvement,</p> </div>

**01. Operation of Cyber Journal**

You can report any unfair act, unlawful corruption, presidential election, etc. on the Internet and check the processing results..

**Question**

**3.7. Does the company provide multiple whistleblowing and advice channels for use by all (e.g. employees and external parties), and do they allow for confidential and, wherever possible, anonymous reporting?**

**Score**

1

**Comments**

There is evidence that the company provides a whistleblowing line, which its employees can access as a confidential reporting channel. The company indicates that this channel is available to all employees and business partners, although the company does not specifically refer to suppliers or joint venture partners.

However, the company receives a score of '1' because there is no evidence that the company provides an externally operated reporting channel, in addition to its internally operated whistleblowing line. There is also no evidence that the company provides channels through which employees can seek advice about its anti-corruption policies and activities. Moreover, there is also no evidence that the channels are available in all relevant languages or that individuals can report incidents anonymously, wherever possible.

**Evidence**

**[10] Reporting (Webpage)**

Accessed 11/11/2019

<https://ethics.rotem.co.kr/en/cyber/report.asp>

Reporting

Home Cyber Journal Reporting

This cyber journal can be used by anyone and the secret of the user is thoroughly guaranteed.

If contact information is inaccurate and if we cannot reach you, we will not accept.

E-mail is used to confirm the processing result, and it takes about 1 week to 2 weeks to process.

Name Information	<input checked="" type="radio"/> Real Name <input type="radio"/> Anonymous
Name	<input type="text"/>
Mobile	<input type="text"/> - <input type="text"/> - <input type="text"/>
E-Mail	<input type="text"/> @ <input type="text"/>
Classification	Select <input type="button" value="v"/>
Title	<input type="text"/>
Content	<input type="text"/>
File Attachment	<input type="button" value="File"/> <input type="button" value="Cancel"/>

**8] Cyber Journal - Introduction (Webpage)**

Accessed 11/11/2019

<https://ethics.rotem.co.kr/en/cyber/about.asp>

**What is Cyber Journal?**

It is an online appreciation system, where employees, business partners, and customers will be notified via Internet of transaction practices related to the Company, various irregularities, irregularly related irregularities, violations of fair trade laws, unreasonable system improvement,

**01. Operation of Cyber Journal**

You can report any unfair act, unlawful corruption, presidential election, etc. on the Internet and check the processing results..

**02. How to Report**

- 1) Internet: Click 'Report'
- 2) Tel : +82-31-8090-8045~8048
- 3) Address : Hyundai Rotem Co., Ltd., 37, Cheldobakmulgwan-ro, Euiwang-si, Gyeonggi-do

**03. Reporting Process**



**[9] Cyber Journal – Informant Protection Program (Webpage)**

Accessed 11/11/2019

<https://ethics.rotem.co.kr/en/cyber/program.asp>

Cyber Journal

We have a program to protect identity of informants so that they can participate with confidence.

Informant Protection Program



**Confidentiality**

It is prohibited to disclose or imply the identity of the informant without the consent of the informant.



**Identity Guarantee**

We protect against disadvantages that may be caused by reports or statements..



**Decrease Liability**

If the informant related to the report is found to be negligent, the informant may be alleviated or exempted.

**[11] Cyber Journal (Webpage)**

Accessed 11/11/2019

<https://ethics.rotem.co.kr/en/main/index.asp>



**Introducing Cyber Journal**

Transparent ethical management is the bright future of Hyundai Rotem.

[read more →](#)

**Reporting to Cyber Journal**

This cyber journal is available and the secret of the user is guaranteed.

[read more →](#)

**Direct Contact Line for Reporting to Cyber Journal**

Employees, business partners, and customers can report and confirm business practices, irregularities, incidents related to the company.

**+82-31-8090-8045~8048**

## 4. Conflict of Interest

<b>Question</b>
4.1. Does the company have a policy defining conflicts of interest – actual, potential and perceived – that applies to all employees and board members?
<b>Score</b>
1
<b>Comments</b>
<p>There is some evidence that the company has a policy for conflicts of interest, which covers employee relationships.</p> <p>However, the company receives a score of ‘1’ because there is no publicly available evidence its policy covers potential or perceived conflicts of interest. There is also no evidence that the company’s policy makes reference to government relationships, financial interests and other employment. Based on publicly available information, it is not clear that the policy applies to all employees and board members.</p>
<b>Evidence</b>
<p><b>[6] Guidelines for Employee Ethics (Webpage)</b>                  Accessed 11/11/2019  <a href="https://ethics.rotem.co.kr/en/ethical/guide.asp">https://ethics.rotem.co.kr/en/ethical/guide.asp</a>                  Carrying out transparent and fair job                  01. Treat all customers equally without discrimination, and perform duties clearly and transparently.                  1) If it is difficult to perform your job fairly due to interest conflict of yourself (or your relative), you should consult your supervisor or human resources team about whether you should avoid the job or not.                  2) You should not give preferential treatment to a specific person for reasons such as regional, blood, school relations, etc.</p> <p>[...]</p> <p><b>Business Ethics</b></p> <ol style="list-style-type: none"> <li>1. Live only within your budget. Do not get used to fancy restaurants or bars. Match your lifestyle according to your salary.</li> <li>2. If you think you can't live within your salary, then quit working and start a business. It is better than going bankrupt later.</li> <li>3. Never have loans that are more than 3 times your monthly salary.</li> <li>4. Avoid standing surety for a loan. If you must, limit them to your direct family members.</li> <li>5. Making inappropriate relationships is the same as corruption.</li> <li>6. Avoid gambling and speculative stock investment.</li> <li>7. Build a habit of paying for yourself, even if it is a very close relationship.</li> <li>8. Do not try to be overly friendly and become friends with everyone.</li> <li>9. Learn and practice how to refuse requests from others.</li> </ol> <p><b>[4] Ethical Behaviour Q&amp;A (Webpage)</b>                  Accessed 11/11/2019  <a href="https://ethics.rotem.co.kr/en/ethical/qna.asp">https://ethics.rotem.co.kr/en/ethical/qna.asp</a>                  Carrying out a transparent and fair job</p> <p>Q My uncle was hired by a supplier I manage this time. I often come across with him at the company and he naturally requests to extend deadline, increase price, etc. What should I do?</p>

A If it is difficult to perform a fair job, consult with the team leader or the Human Resources Team about whether or not to avoid the job.

**[1] Code of Ethics Practice (Webpage)**

Accessed 11/11/2019

<https://ethics.rotem.co.kr/en/ethical/doctrine.asp>

We, Hyundai Rotem employees, recognize that ethics is a source of corporate competitiveness and promise that

Hyundai Rotem will actively participate in the realization of ethical charter spirit so that it can be trusted by the people. Therefore, we promise as below.

[...]

**05. We**

do not accept any form of interest that could impair fairness in relation to our duties. We do not accept from our stakeholders, and we firmly refuse to ask for unfair business practices and duties using our authority.

**06. We**

protect business secrets and avoid any conduct or relationship that conflicts with the interests of company and individual.

<b>Question</b>
<b>4.2. Are there procedures in place to identify, declare and manage conflicts of interest, which are overseen by a body or individual ultimately accountable for the appropriate management and handling of conflict of interest cases?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
Based on publicly available information, there is no clear evidence that the company has procedures to manage conflicts of interest or ensure their oversight. Where conflicts involve employee relationships, the company states that employees should consult with their supervisor or human resources team; but it is not clear that this applies to all conflicts of interest as part of a broader set of procedures.
<b>Evidence</b>
<p><b>[6] Guidelines for Employee Ethics (Webpage)</b>                  Accessed 11/11/2019  <a href="https://ethics.rotem.co.kr/en/ethical/guide.asp">https://ethics.rotem.co.kr/en/ethical/guide.asp</a>                  Carrying out transparent and fair job</p> <p>01. Treat all customers equally without discrimination, and perform duties clearly and transparently.                  1) If it is difficult to perform your job fairly due to interest conflict of yourself (or your relative), you should consult your supervisor or human resources team about whether you should avoid the job or not.</p>



<b>Question</b>
4.3. Does the company have a policy and procedure regulating the appointment of directors, employees or consultants from the public sector?
<b>Score</b>
0
<b>Comments</b>
There is no publicly available evidence that the company has a policy regulating the employment of current or former public officials.
<b>Evidence</b>
No evidence found.

<b>Question</b>
<b>4.4. Does the company report details of the contracted services of serving politicians to the company?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no publicly available evidence that the company reports details of the contracted services of serving politicians.
<b>Evidence</b>
No evidence found.

## 5. Customer Engagement

### 5.1 Contributions, Donations and Sponsorships

<b>Question</b>
5.1.1. Does the company have a clearly defined policy and/or procedure covering political contributions?
<b>Score</b>
0
<b>Comments</b>
There is no publicly available evidence that the company has a policy on corporate political contributions.
<b>Evidence</b>
No evidence found.

<b>Question</b>
<b>5.1.2. Does the company publish details of all political contributions made by the company and its subsidiaries, or a statement that it has made no such contribution?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no publicly available evidence that the company discloses full details of its political contributions.
<b>Evidence</b>
No evidence found.

<b>Question</b>
<b>5.1.3. Does the company have a clearly defined policy and/or procedure covering charitable donations and sponsorships, whether made directly or indirectly, and does it publish details of all such donations made by the company and its subsidiaries?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no evidence that the company has a policy and procedure covering charitable donations and sponsorships. The company publishes some information on its sponsorships and donations but it does not provide comprehensive details to indicate that this covers all sponsorships, nor is there evidence that the company has an accompanying policy or procedure in place.
<b>Evidence</b>
<p><b>[6] Guidelines for Employee Ethics (Webpage)</b>                  Accessed 12/11/2019  <a href="https://ethics.rotem.co.kr/en/ethical/guide.asp">https://ethics.rotem.co.kr/en/ethical/guide.asp</a>                  03. Employees should not take unfair demands or receive compensation from stakeholders for their business superiority or dominant position.</p> <p>[...]</p> <p>3) No sponsorship should be requested or provided to stakeholders at the event. Pre-notification of the event should be prohibited as it is considered to be an intentional act to receive sponsorship.</p> <p><b>[1] Code of Ethics Practice (Webpage)</b>                  Accessed 12/11/2019  <a href="https://ethics.rotem.co.kr/en/ethical/doctrine.asp">https://ethics.rotem.co.kr/en/ethical/doctrine.asp</a></p> <hr/> <p>We, Hyundai Rotem employees, recognize that ethics is a source of corporate competitiveness and promise that</p> <p>Hyundai Rotem will actively participate in the realization of ethical charter spirit so that it can be trusted by the people. Therefore, we promise as below.</p> <p>[...]</p> <p><b>07. We</b></p> <p>try to achieve pride and reward by doing our best in our duties with responsibility, and strive to contribute to national, social and company development through constant self-development.</p> <p><b>[4] Ethical Behaviour Q&amp;A (Webpage)</b>                  Accessed 12/11/2019  <a href="https://ethics.rotem.co.kr/en/ethical/qna.asp">https://ethics.rotem.co.kr/en/ethical/qna.asp</a>                  Carrying out a transparent and fair job</p> <p>[...]</p> <p>Q If there are in-house events such as athletic meet, climbing, etc., there is a case where we receive donated goods (goods, drinks, liquor, etc.) from trading companies. Is this not allowed in ethical behavior?                  A Receiving donations from trading companies is a violation of ethical conduct guidelines. If you receive donations, you must explain the purpose of company's ethical management and return them. You should settle down with practices that</p>

hold simple events within company's budget. In particular, you should not intentionally talk to the trading company and give burden of giving donated goods.

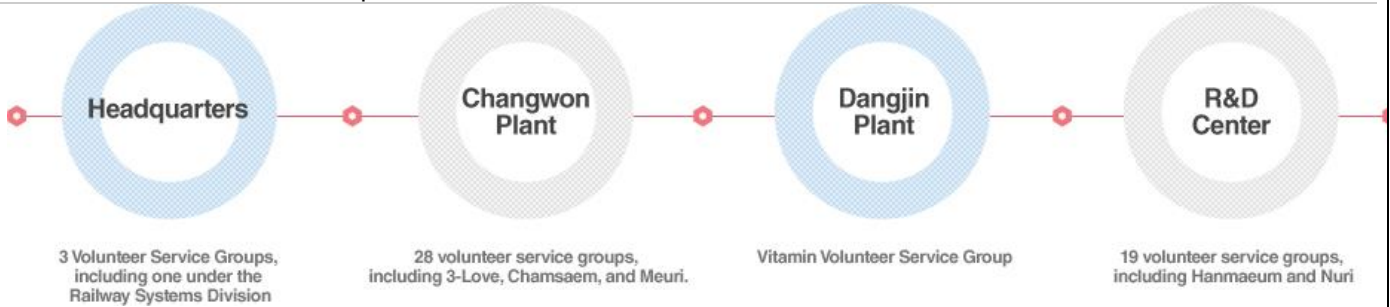
**[12] Corporate Social Responsibility (Webpage)**

Accessed 12/11/2019

<https://www.hyundai-rotem.co.kr/Eng/Contribution/Field/Field.asp>

Fields of Activities

About Volunteer Service Group



**Activities**

**One Company-One Rural Community**

We engage in various activities together with rural communities to create greater social values, including the provision of helping hand, the purchase of specialties, and friendly exchange.



**Community Love Sharing**

To make a beautiful society in harmony with local communities, we carry out a range of activities, such as friendly exchange and support funds.

- Clean-up of the river near our R&D Center
- (Dongjin Senior Welfare Center, Dangjin Children Center, Korea Parents Association, Dangjin Senior Care Center, Daniel Social Welfare Corp., CWWC, Anyang Welfare Center for the Children)



**Support Funds**

We provide support funds to our partner institutes and neighbors in need, and also conduct a campaign of rounding out fractions of our wages less than 1,000 won and using it for our neighbors in need.

Moreover, our employees have taken the initiative to form 'Samsarang', a group of supporters working to collect funds on a monthly basis and donate them to our colleagues and local environmental organizations.

- Provision of support funds to 17 organizations and 29 families in need
- Rounding out fraction campaign
- Samsarang support activities



**Blood Donation**

Hyundai Rotem Company carries out a twice-yearly enterprise-wide blood donation campaign to give hope to patients suffering from chronic blood problems and help our neighbors through blood donations.



**Charity Bazaar**

In our enterprise-wide charity bazaar campaign, we help our neighbors in need by selling articles donated by our executives and employees, and also donate articles to our 'Beautiful Store'.



**[13] Corporate Social Responsibility – Hyundai Rotem is always with you (Webpage)**

Accessed 12/11/2019

<https://www.hyundai-rotem.co.kr/Eng/Contribution/Site/JoinUs.asp>

To give a helping hand to all our neighbors in need, Hyundai Rotem continuously conducts social contribution activities. At Hyundai Rotem, we not only strive to conduct eco-friendly economic activities and preserve the environment, but also actively carry out our social responsibilities as a corporate citizen, as shown by our 'One Company-One Rural Community' sisterhood relationship and volunteer service in local communities.



Furthermore, we proactively seek to care for our socially neglected neighbors through wide-ranging activities, including a Blood donation program, the donation of articles to 'Beautiful Store', and our sisterhood relationship with child breadwinners and senior citizens who live alone. To make a society of a united heart, we always make sure we listen to the voices of the world and strive to make our precious dreams come true.

**Hyundai Rotem shares pleasure with you**



**Social Welfare**

Volunteer activities with fun and pleasure

**Culture and Arts**

The time when we become one

**Disaster and Restoration**

Great moment both for volunteers and beneficiaries

**Hyundai Rotem is always with nature**



**Protection of the Environment**

Campaign to reduce waste and preserve the environment

**Water Saving**

Campaign to reduce water

**Hyundai Rotem thinks and practices**



**Activities**

One Company-One Rural Community sisterhood program

'Share Love' donation for local communities

Support Funds

blood donations

and charity bazaars

## 5.2 Lobbying

<b>Question</b>
5.2.1 Does the company have a policy and/or procedure covering responsible lobbying?
<b>Score</b>
0
<b>Comments</b>
There is no publicly available evidence that the company has a policy or procedure on lobbying.
<b>Evidence</b>
No evidence found.

<b>Question</b>
<b>5.2.2 Does the company publish details of the aims and topics of its public policy development and lobbying activities it carries out?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no publicly available evidence that the company publishes any information on its lobbying aims, topics or activities.
<b>Evidence</b>
No evidence found.

<b>Question</b>
5.2.3 Does the company publish full details of its global lobbying expenditure?
<b>Score</b>
0
<b>Comments</b>
There is no publicly available evidence that the company provides any details about its global lobbying expenditure.
<b>Evidence</b>
No evidence found.

### 5.3 Gifts and Hospitality

<b>Question</b>						
<b>5.3.1 Does the company have a policy and/or procedure on gifts and hospitality to ensure they are bona fide to prevent undue influence or other corruption?</b>						
<b>Score</b>						
<b>1</b>						
<b>Comments</b>						
<p>Based on publicly available information, there is evidence that the company has a policy on the giving and receipt of gifts. The company’s policy specifies financial limits for the receipt of gifts. There is evidence that gifts received are recorded in a depository that is accessible to those responsible for oversight of the process.</p> <p>However, the company receives a score of ‘1’ because there is no evidence it addresses the risks associated with gifts and hospitality given to/received from public officials. There is also no evidence that the company records or specifies financial limits for the giving of gifts, nor the giving and receipt of hospitality.</p>						
<b>Evidence</b>						
<p><b>[14] Gift Management Regulations (Webpage)</b>                  Accessed 12/11/2019  <a href="https://ethics.rotem.co.kr/en/ethical/regulation.asp">https://ethics.rotem.co.kr/en/ethical/regulation.asp</a></p> <table border="0"> <tr> <td style="vertical-align: top;"> <p><u>01. Purpose</u></p> <p>This regulation is aimed at maintaining fair business processing and promoting transparent trading relationship by managing and processing gifts received by employees during their work or in relation to their work.</p> </td> <td style="vertical-align: top;"> <p><u>02. What is a gift?</u></p> <p>Any items the employees received from partners or stakeholders that exceed market value of 50,000 KRW.</p> </td> </tr> <tr> <td style="vertical-align: top;"> <p><u>03. Responsibility and Authorization</u></p> <p>- <b>Employees</b> : Complying with the Code of Ethics and Ethical Conduct Guidelines, they should not in any case require gifts to business partners or external organizations for their work, nor shall similar actions be made. Inevitably received gifts should be reported to the general affairs team without delay and the gift must be delivered within 24 hours..</p> </td> <td style="vertical-align: top;"> <p>- <b>General manager</b> : The gift received shall be filled in the gift management book and kept in a separate place. Archived gifts should be approved by the CEO and be transferred or disposed of for public interest.</p> </td> </tr> <tr> <td style="vertical-align: top;"> <p><u>04. Reporting and Receiving Gifts</u></p> <p>If an employee receives a gift that is worth more than KRW 50,000 from the outside, he / she should report it to the relevant general affairs team without delay..</p> </td> <td style="vertical-align: top;"> <p><u>05. Transfer and Disposal of Archived Gift</u></p> <p>The criteria for disposing of gifts are limited to those necessary for business purposes or for public interest. At the end of every year, the general affairs team can process the archived gifts after obtaining report on disposition of the gift. If the gifts can not be maintained for other reasons, it may be disposed after obtaining report on it.</p> </td> </tr> </table>	<p><u>01. Purpose</u></p> <p>This regulation is aimed at maintaining fair business processing and promoting transparent trading relationship by managing and processing gifts received by employees during their work or in relation to their work.</p>	<p><u>02. What is a gift?</u></p> <p>Any items the employees received from partners or stakeholders that exceed market value of 50,000 KRW.</p>	<p><u>03. Responsibility and Authorization</u></p> <p>- <b>Employees</b> : Complying with the Code of Ethics and Ethical Conduct Guidelines, they should not in any case require gifts to business partners or external organizations for their work, nor shall similar actions be made. Inevitably received gifts should be reported to the general affairs team without delay and the gift must be delivered within 24 hours..</p>	<p>- <b>General manager</b> : The gift received shall be filled in the gift management book and kept in a separate place. Archived gifts should be approved by the CEO and be transferred or disposed of for public interest.</p>	<p><u>04. Reporting and Receiving Gifts</u></p> <p>If an employee receives a gift that is worth more than KRW 50,000 from the outside, he / she should report it to the relevant general affairs team without delay..</p>	<p><u>05. Transfer and Disposal of Archived Gift</u></p> <p>The criteria for disposing of gifts are limited to those necessary for business purposes or for public interest. At the end of every year, the general affairs team can process the archived gifts after obtaining report on disposition of the gift. If the gifts can not be maintained for other reasons, it may be disposed after obtaining report on it.</p>
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<p><b>[6] Guidelines for Employee Ethics (Webpage)</b>                  Accessed 12/11/2019  <a href="https://ethics.rotem.co.kr/en/ethical/guide.asp">https://ethics.rotem.co.kr/en/ethical/guide.asp</a></p> <p>03. Employees should not take unfair demands or receive compensation from stakeholders for their business superiority or dominant position.</p> <p>1) Should not make unreasonable demands on stakeholders by taking advantage of their superior position in the business.</p> <ul style="list-style-type: none"> <li>- Requesting expenses such as dinner expenses, golf expenses, travel expenses, etc., and requests for reimbursement for credit cards, foreign currency loans, subrogation, etc.</li> <li>- Personnel solicitation, sales of goods, insurances, participation of multi-level companies, demand for borrowing of bonds, etc.</li> </ul>						

2) Should not lead unfair consideration from suppliers by deliberate delays

[...]

4) Should not ask for free parts excessive discounts from suppliers when other purchasing other items or parts.

### Business Ethics

1. Live only within your budget. Do not get used to fancy restaurants or bars. Match your lifestyle according to your salary.
2. If you think you can't live within your salary, then quit working and start a business. It is better than going bankrupt later.
3. Never have loans that are more than 3 times your monthly salary.
4. Avoid standing surety for a loan. If you must, limit them to your direct family members.
5. Making inappropriate relationships is the same as corruption.
6. Avoid gambling and speculative stock investment.
7. Build a habit of paying for yourself, even if it is a very close relationship.
8. Do not try to be overly friendly and become friends with everyone.
9. Learn and practice how to refuse requests from others.

#### [4] Ethical Behaviour Q&A (Webpage)

Accessed 12/11/2019

<https://ethics.rotem.co.kr/en/ethical/qna.asp>

Carrying out a transparent and fair job

[...]

Q During the holidays, the team leader handed out gift certificates he/she received from trading company to the employees. I do not know what kind of trading company it was from, and I can not refuse it because it is given by the team leader. Is it ok to accept it?

A If a team leader receives a gift certificate from a trading company and gives it to an employee, the team leader violated the Ethics Guidelines. However, employees who receive them are also in violation of the Ethical Conduct Guidelines, so you should report them to the General Affairs Team or the Human Resources Team

## 6. Supply Chain Management

<b>Question</b>
<b>6.1. Does the company require the involvement of its procurement department in the establishment of new supplier relationships and in the oversight of its supplier base?</b>
<b>Score</b>
<b>1</b>
<b>Comments</b>
<p>Based on publicly available information, there is some evidence that the company's procurement department is involved, in some capacity, in the establishment of supplier relationships.</p> <p>However, the company receives a score of '1' as it is not clear that the procurement department is the main body responsible for oversight of the company's supplier base. In addition, there is no evidence that the company assures itself of the procurement department's involvement at least every three years.</p>
<b>Evidence</b>
<p><b>[15] Selection / Operation of Partner Companies (Webpage)</b>                  Accessed 12/11/2019  <a href="https://ethics.rotem.co.kr/en/accompany/guide_02.asp">https://ethics.rotem.co.kr/en/accompany/guide_02.asp</a>                  6. Procedures for Registration of new supplier</p> <p>New registration</p> <p>[...]</p> <p>A new supplier has to be qualified for the below requirements, procurement team may conduct a site inspection with other relevant teams. When registering a supplier with "B" classification, it must be reported to the Chief of Procurement Team first. If a supplier is not qualified, it shall be reported to the Chief of Procurement Team before approve the registration. [However, Market Product/ consumables (gloves/welding rod/others)/distributors/raw materials/foreign companies are excluded]</p> <p>New Registration Standard</p> <p><b>[16] Internal Review Committee (Webpage)</b>                  Accessed 12/11/2019  <a href="https://ethics.rotem.co.kr/en/accompany/guide_03.asp">https://ethics.rotem.co.kr/en/accompany/guide_03.asp</a>                  1.Purpose</p> <p>This guideline defines a set of procedures for the operation of internal review committee to consider the fairness and legality of subcontract transactions between the Company and its partners and its purpose is to contribute to the establishment of fair subcontracting order and to prevent violation of subcontract act in advance.</p> <p>[...]</p> <p>4. Internal Review Committee's Agenda</p> <p>The review agenda of the internal review committee shall be determined as follows.</p> <p>4.1 Parts for Rail Business, Defense Business and Plant Business                  4.2 Registering a new supplier – review on appropriateness of registration standard and procedures                  4.3 Cancelling transaction with partner company – review on appropriateness of cancellation standards and procedures                  4.4 Re-Consideration where a company that has been rejected or cancelled by the supplier complains about the decision                  4.5 Price Determination (Adjustment)                  4.5.1 Target and scope of review</p>

The Committee shall review the transactions that amounts to 2% of the total subcontract amounts for the previous business year (when the total subcontract amount is less than 1 trillion Korean Won), or 1% of the total subcontract amounts for the previous business year (when the total subcontract amount is more than 1 trillion Korean Won). (Same standard as Fair Trade Commission)

4.5.2 Criteria for review

- Compliance with the company registration/cancellation/change procedure (RMS-B204)
- Compliance with business selection and bidding procedures (RMS-B207)
- Pricing (Compliance with competition/review bidding procedures)

4.6 Employee sanctions for violation of related laws such as subcontract law

4.7 Subcontracting matters deemed to require review by other internal review committee



<b>Question</b>
<b>6.2 Does the company conduct risk-based anti-bribery and corruption due diligence when engaging or re-engaging with its suppliers?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no publicly available evidence that the company has formal procedures to conduct risk-based anti-bribery and corruption due diligence when engaging or re-engaging with its suppliers.
<b>Evidence</b>
<p><b>[2] Ethical Charter (Webpage)</b>                  Accessed 12/11/2019  <a href="https://ethics.rotem.co.kr/en/ethical/constitution.asp">https://ethics.rotem.co.kr/en/ethical/constitution.asp</a></p> <p><u>05. Establishment of Transparent/Ethical Management</u></p> <p>We process all our business by transparent standards and maintain a fair trade relationship with all business partners including customers and vendors to ensure mutual benefits in transparent terms of trade, thereby establishing an honest corporate culture trusted by the public.                  We dismiss all inquiries from all stakeholders that may impair fairness in relation to our duties, and we do not receive any unfair advantage.</p>

<b>Question</b>
<b>6.3 Does the company require all of its suppliers to have adequate standards of anti-bribery and corruption policies and procedures in place?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no publicly available evidence that the company ensures that its suppliers have anti-bribery and corruption policies in place that meet a high standard.
<b>Evidence</b>
No evidence found.

<b>Question</b>
<b>6.4 Does the company ensure that its suppliers require all their sub-contractors to have anti-corruption programmes in place that at a minimum adhere to the standards established by the main contractor?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no publicly available evidence that the company takes steps to ensure that the substance of its anti-bribery and corruption standards are required throughout the supply chain.
<b>Evidence</b>
No evidence found.

<b>Question</b>
<b>6.5 Does the company publish high-level results from ethical incident investigations and disciplinary actions against suppliers?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no publicly available evidence that the company publishes any data on ethical or anti-bribery and corruption investigations or the associated disciplinary actions relating to its suppliers.
<b>Evidence</b>
No evidence found.

## 7. Agents, Intermediaries and Joint Ventures

### 7.1 Agents and Intermediaries

<b>Question</b>
7.1.1 Does the company have a clear policy on the use of agents?
<b>Score</b>
0
<b>Comments</b>
There is no publicly available evidence that the company has a policy on the use of agents.
<b>Evidence</b>
No evidence found.

<b>Question</b>
<b>7.1.2 Does the company conduct risk-based anti-bribery and corruption due diligence when engaging or re-engaging its agents and intermediaries?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no publicly available evidence that the company conducts anti-bribery and corruption due diligence on its agents or intermediaries.
<b>Evidence</b>
No evidence found.

<b>Question</b>
<b>7.1.3 Does the company aim to establish the ultimate beneficial ownership of its agents and intermediaries?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no publicly available evidence that the company aims to establish the beneficial ownership of its agents.
<b>Evidence</b>
No evidence found.

<b>Question</b>
<b>7.1.4 Does the company’s anti-bribery and corruption policy apply to all agents and intermediaries acting for or on behalf of the company, and does it require anti-bribery and corruption clauses in its contracts with these entities?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no publicly available evidence that the company includes anti-bribery and corruption clauses in its contracts with agents and intermediaries.
<b>Evidence</b>
No evidence found.



<b>Question</b>
<b>7.1.5 Does the company ensure that its incentive schemes for agents are designed in such a way that they promote ethical behaviour and discourage corrupt practices?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no publicly available evidence that the company addresses incentive structures as a risk factor in agent behaviour.
<b>Evidence</b>
No evidence found.

<b>Question</b>
<b>7.1.6 Does the company publish details of all agents currently contracted to act with and on behalf of the company?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no publicly available evidence that the company publishes any details of the agents currently contracted to act for and/or on behalf of the company.
<b>Evidence</b>
No evidence found.

<b>Question</b>
<b>7.1.7 Does the company publish high-level results from incident investigations and sanctions applied against agents?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no publicly available evidence that the company publishes any data on ethical or bribery and corruption related investigations, incidents or the associated disciplinary actions involving agents.
<b>Evidence</b>
No evidence found.

## 7.2 Joint Ventures

<b>Question</b>
<b>7.2.1 Does the company conduct risk-based anti-bribery and corruption due diligence when entering into and operating as part of joint ventures?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no publicly available evidence that the company conducts anti-bribery and corruption due diligence on its joint venture partners or entities.
<b>Evidence</b>
No evidence found.

<b>Question</b>
<b>7.2.2 Does the company commit to incorporating anti-bribery and corruption policies and procedures in all of its joint venture partnerships, and does it require anti-bribery and corruption clauses in its contracts with joint venture partners?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no publicly available evidence that the company commits to establishing or implementing anti-bribery and corruption policies or procedures in its joint ventures, nor that it requires anti-corruption clauses in its contracts with joint venture partners.
<b>Evidence</b>
No evidence found.

<b>Question</b>
7.2.3 Does the company commit to take an active role in preventing bribery and corruption in all of its joint ventures?
<b>Score</b>
0
<b>Comments</b>
There is no publicly available evidence to indicate that the company commits to take an active role in preventing bribery and corruption in all of its joint ventures.
<b>Evidence</b>
No evidence found.

## 8. Offsets

<b>Question</b>
<b>8.1 Does the company explicitly address the corruption risks associated with offset contracting, and is a dedicated body, department or team responsible for oversight of the company's offset activities?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no publicly available evidence that the company addresses the corruption risks associated with offset contracting, nor is there evidence that a dedicated body, department or team is responsible for monitoring its offset activities.
<b>Evidence</b>
No evidence found.

<b>Question</b>
<b>8.2 Does the company conduct risk-based anti-bribery and corruption due diligence on all aspects of its offset obligations, which includes an assessment of the legitimate business rationale for the investment?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no publicly available evidence that the company has a procedure in place to conduct risk-based anti-bribery and corruption due diligence on its offset obligations.
<b>Evidence</b>
No evidence found.






























<b>Question</b>
<b>8.3 Does the company publish details of all offset agents and brokers currently contracted to act with and/or on behalf of the company?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no publicly available evidence that the company publishes any details of the offset agents, brokers or consultancy firms currently contracted to act with and on behalf of the its offset programme.
<b>Evidence</b>
No evidence found.


<b>Question</b>
<b>8.4 Does the company publish details about the beneficiaries of its indirect offset projects?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no publicly available evidence that the company publishes any details of its indirect offset obligations or contracts.
<b>Evidence</b>
No evidence found.

## 9. High Risk Markets

<b>Question</b>
<b>9.1 Does the company have enhanced risk management procedures in place for the supply of goods or services to markets or customers in countries identified as at a high risk of corruption?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no publicly available evidence that the company acknowledges the corruption risks of operating in different markets, nor that risk assessment procedures are used to inform the company's operations in high risk markets.
<b>Evidence</b>
No evidence found.

<b>Question</b>										
<b>9.2 Does the company disclose details of all of its fully consolidated subsidiaries and non-fully consolidated holdings (associates, joint ventures and other related entities)?</b>										
<b>Score</b>										
<b>0</b>										
<b>Comments</b>										
The company publishes some information on its affiliates, ordered by industry. However, the company receives a score of '0' because it does not provide further details of these entities, such as the percentage ownership, country of incorporation and country/countries of operation. There is also no evidence to clearly indicate how frequently this information is updated.										
<b>Evidence</b>										
<p><b>[17] Affiliates Introduction (Webpage)</b>                  Accessed 12/11/2019  <a href="https://www.hyundai-rotem.co.kr/Eng/Company/Family/Group_Intro.asp#this">https://www.hyundai-rotem.co.kr/Eng/Company/Family/Group_Intro.asp#this</a></p> <p><b>Car Manufacturers</b></p> <table border="0"> <tr> <td style="width: 50%; vertical-align: top;">  <p>Hyundai Motor                      Manufacturing and sales of cars                      Main Office - Yangjae-dong                      Plants - Ulsan, Asan, Jeonju  <a href="http://www.hyundai.com/">http://www.hyundai.com/</a></p> </td> <td style="width: 50%; vertical-align: top;">  <p>Kia Motor                      Manufacturing and sales of cars                      Main Office - Yangjae-dong                      Plants - Gwangju, Gwangmyeong, Hwaseong  <a href="http://www.kia.com/">http://www.kia.com/</a></p> </td> </tr> </table> <hr/> <p><b>Steel</b></p> <table border="0"> <tr> <td style="width: 50%; vertical-align: top;">  <p>Hyundai Steel                      Iron manufacture and steel (Rebar, steel, hot rolling, stainless, cold rolling, etc.)                      Office - Yangjae-dong   Plants: Incheon, Dangpo, Dangjin  <a href="http://www.hyundai-steel.com">http://www.hyundai-steel.com</a></p> </td> <td style="width: 50%; vertical-align: top;">  <p>Hyundai BNG Steel                      Steel rolling, extrusion, can manufacturing (stainless cold rolling)                      Plant - Changwon  <a href="http://www.hyundai-bngsteel.com/kr">http://www.hyundai-bngsteel.com/kr</a></p> </td> </tr> </table> <hr/> <p><b>Construction</b></p> <table border="0"> <tr> <td style="width: 50%; vertical-align: top;">  <p>Hyundai E&amp;C                      Civil engineering, construction, electro-mechanical area                      Main Office - Gye-dong  <a href="http://www.hdec.kr">http://www.hdec.kr</a></p> </td> <td style="width: 50%; vertical-align: top;">  <p>Hyundai Engineering                      Chemical plant, generation, energy, industrial plant, civil engineering, etc                      Main Office - Mok-dong  <a href="http://www.hec.co.kr">http://www.hec.co.kr</a></p> </td> </tr> <tr> <td style="width: 50%; vertical-align: top;">  <p>Hyundai E&amp;S Industries                      Fabrication and installation of steel frame, general steel bridge, special steel bridge, long span bridge, plant steel frame, and industrial equipment                      Main Office - Seosan  <a href="http://www.hdesi.co.kr">http://www.hdesi.co.kr</a></p> </td> <td style="width: 50%; vertical-align: top;">  <p>Hyundai Architects &amp; Engineers Associates                      Building design, engineering, construction and maintenance, environmental plan, etc.                      Main Office - Unni-dong  <a href="http://www.hda.co.kr">http://www.hda.co.kr</a></p> </td> </tr> <tr> <td style="width: 50%; vertical-align: top;">  <p>Hyundai City Corporation                      Development project of the LaTierra, a tourism &amp; leisure corporate city brand in Taean                      Main Office - Taean  <a href="http://www.latierra.kr">http://www.latierra.kr</a></p> </td> <td></td> </tr> </table>	 <p>Hyundai Motor                      Manufacturing and sales of cars                      Main Office - Yangjae-dong                      Plants - Ulsan, Asan, Jeonju  <a href="http://www.hyundai.com/">http://www.hyundai.com/</a></p>	 <p>Kia Motor                      Manufacturing and sales of cars                      Main Office - Yangjae-dong                      Plants - Gwangju, Gwangmyeong, Hwaseong  <a href="http://www.kia.com/">http://www.kia.com/</a></p>	 <p>Hyundai Steel                      Iron manufacture and steel (Rebar, steel, hot rolling, stainless, cold rolling, etc.)                      Office - Yangjae-dong   Plants: Incheon, Dangpo, Dangjin  <a href="http://www.hyundai-steel.com">http://www.hyundai-steel.com</a></p>	 <p>Hyundai BNG Steel                      Steel rolling, extrusion, can manufacturing (stainless cold rolling)                      Plant - Changwon  <a href="http://www.hyundai-bngsteel.com/kr">http://www.hyundai-bngsteel.com/kr</a></p>	 <p>Hyundai E&amp;C                      Civil engineering, construction, electro-mechanical area                      Main Office - Gye-dong  <a href="http://www.hdec.kr">http://www.hdec.kr</a></p>	 <p>Hyundai Engineering                      Chemical plant, generation, energy, industrial plant, civil engineering, etc                      Main Office - Mok-dong  <a href="http://www.hec.co.kr">http://www.hec.co.kr</a></p>	 <p>Hyundai E&amp;S Industries                      Fabrication and installation of steel frame, general steel bridge, special steel bridge, long span bridge, plant steel frame, and industrial equipment                      Main Office - Seosan  <a href="http://www.hdesi.co.kr">http://www.hdesi.co.kr</a></p>	 <p>Hyundai Architects &amp; 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Auto Parts



Hyundai MOBIS  
Manufacturing and sales of auto parts (A/S parts and modules)  
Main Office - Yeoksam-dong, Plants - Ulsin and other 8 cities  
<http://www.mobis.co.kr>



Hyundai WIA  
Manufacturing of auto parts (constant velocity joints, transmission, modules), manufacturing and sales of machine tools  
Plants - Changwon, Gwangju, Banwol, Poseung  
<http://www.hyundai-wia.com>



Hyundai Transys  
Manufacturing of auto parts (commercial T/M, axle, seats, etc.)  
Plant - Seosan  
<http://www.hyundai-transys.com/ko/main.do>



Hyundai Kefico  
Manufacturing of auto parts (ECU, sensors)  
Main Office & Plant - Gunpo  
<http://www.hyundai-kefico.com>



Hyundai Partecs  
Production of A/S parts (bodies of discontinued models)  
Main Office & Plant - Seosan  
<http://www.partecs.co.kr>




Hyundai MSEAT  
Manufacturing of auto parts (seats)  
Plants - Asan, Ulsan  
<http://www.hyundai-mseat.com>




Hyundai IHL  
Manufacturing of auto parts (lamps)  
Main Office & Plant - Gyeongju  
<http://www.ihl.co.kr>


Finance, Transport, IT and Service




Hyundai Glovis  
Total logistics service, used car auction, etc.  
Main Office - Yeoksam-dong  
<http://www.glovis.net>




Hyundai Capital  
Credit finance (installment finance, auto lease)  
Main Office - Yeouido  
<http://www.hyundaicapital.com>




Hyundai Card  
Credit card business  
Main Office - Yeouido  
<http://www.hyundaicard.com>




Hyundai Commercial  
Credit finance (facility rental, installment finance)  
Main Office - Yeouido  
<http://www.hyundaicommercial.com>




HMC Investment Securities  
Stock trading, real estate lease  
Main Office - Yeouido  
<http://www.hmcib.com>



Innocean  
Advertising agency, advertisement making, exhibition and event agency  
Main Office: Yeoksam-dong  
<http://www.innocean.com>




Haevichi Hotel & Resort  
Hotel and Condominium  
Golf range in Jeju  
<http://www.haevichi.com>



Hyundai Autoever  
IT support, information system development, internet education business, etc.  
Main Office - Uiwang  
<http://www.hyundai-autoever.com>



Hyundai NGV  
R&D, special technology education, fostering of research scholarship students  
In Seoul National University  
<http://www.hyundai-ngv.com>



Hyundai Autron  
R&D, product manufacture, sales and services for automotive semiconductors, automotive electronic control systems  
Bundang  
<http://www.hyundai-autron.com>



Hyundai MnSOFT  
Sales of digital map and navigation software  
Main Office - Nonhyeon-dong  
<http://www.hyundai-mnsoft.com>

**Question**

**9.3 Does the company disclose its beneficial ownership and control structure?**

**Score**

**0**

**Comments**

The company publishes some information about its beneficial ownership, which identifies major shareholders with a stake of 25% or higher; however, there is evidence to indicate that this information dates from 2016 and 2017, so therefore it is not clear that this ownership structure is up-to-date. The company has not published more recent beneficial ownership information on its website, and there is no indication that the company discloses its ownership in a freely available central public register.

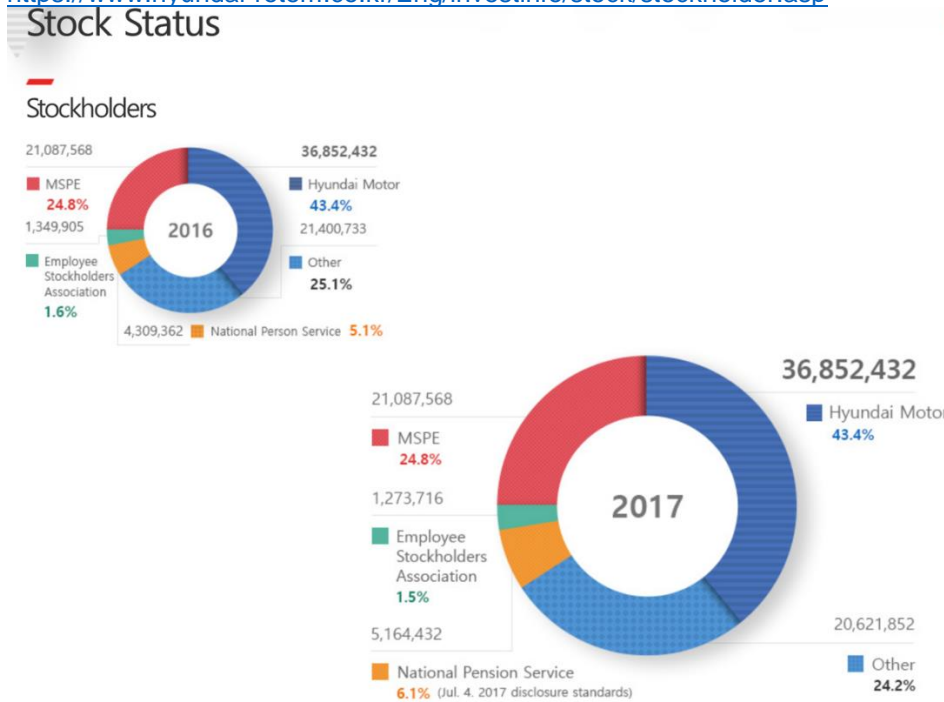
It is noted that the company is publicly listed, however it does not have voting shares admitted to trading on one of the regulated markets listed in the scoring criteria so is not eligible for a score of '2'.

**Evidence**

**[18] Stock Status (Webpage)**

Accessed 12/11/2019

<https://www.hyundai-rotam.co.kr/Eng/investinfo/stock/stockholder.asp>



**Stockholders (2016)**

Stockholder Name	Stock Type	Stockholding Ratio (%)	No. of Stocks
Hyundai Motor Company	Common Stock	43.40%	36,852,432
MSPE Metro Investment AB	Common Stock	24.80%	21,087,568
National Pension Service	Common Stock	5.07%	4,309,362
Employee Stockholders Association	Common Stock	1.59%	1,349,905
Other	Common Stock	25.14%	21,400,733
<b>Total</b>		<b>100%</b>	<b>85,000,000</b>

**[19] Stock Exchange (Webpage)**

Accessed 12/11/2019

<https://www.bloomberg.com/profile/company/064350:KS>

# Hyundai Rotem Co Ltd

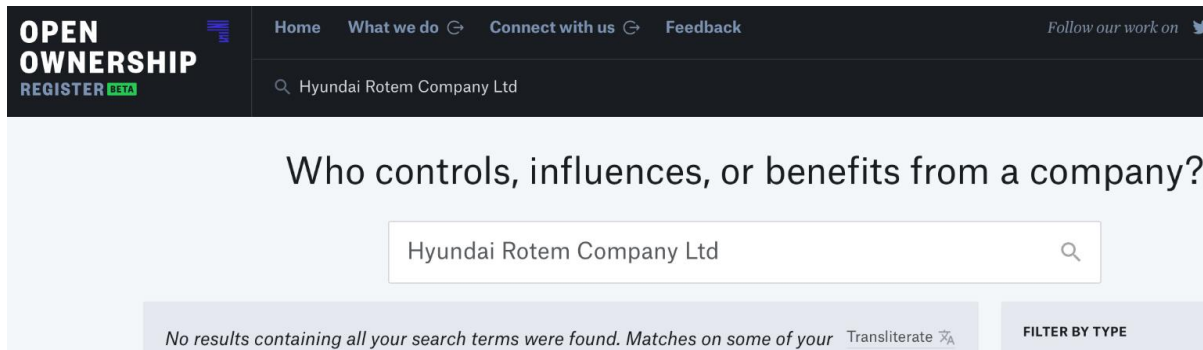
Hyundai Rotem Company Ltd. manufactures railroad equipment and defense vehicles. The Company produces high-speed trains, light rail vehicles, locomotives, and passenger coaches, main battle tanks, armored recovery vehicles, and related defense equipment. Hyundai Rotem operates worldwide.

CURRENT PRICE			
<b>064350:KS</b> 16,200.00 KRW ▼ -150.00 -0.92% AS OF 01:44 AM EST 11/12/2019 <a href="#">SEE QUOTE</a>			
SECTOR	INDUSTRY	SUB-INDUSTRY	FOUNDED
Industrials	Transportation Equipment	Railroad Rolling Stock	07/01/1999
ADDRESS	PHONE	WEBSITE	NO. OF EMPLOYEES
488 Changwondae-ro Uichang-gu Changwon Korea, Republic of (South)	82-55-273-1341	www.hyundai-rotem.co.kr	3617

**[20] Open Ownership Register (Webpage)**

Accessed 12/11/2019

<https://register.openownership.org/search?utf8=√&q=Hyundai+Rotem+Company+Limited>



The screenshot shows the Open Ownership Register search interface. At the top left is the logo 'OPEN OWNERSHIP REGISTER BETA'. The navigation bar includes 'Home', 'What we do', 'Connect with us', and 'Feedback'. On the right, it says 'Follow our work on' with a Twitter icon. A search bar contains the text 'Hyundai Rotem Company Ltd'. Below the search bar, the main heading reads 'Who controls, influences, or benefits from a company?'. The search results area shows 'No results containing all your search terms were found. Matches on some of your' followed by a transliterate icon and a 'FILTER BY TYPE' button.

<b>Question</b>
9.4 Does the company publish a percentage breakdown of its defence sales by customer?
<b>Score</b>
0
<b>Comments</b>
There is no evidence that the company publishes any information on its defence sales by customer.
<b>Evidence</b>
No evidence found.



## 10. State-Owned Enterprises (SOEs)

<b>Question</b>
10.1 Does the SOE publish a breakdown of its shareholder voting rights?
<b>Score</b>
N/A
<b>Comments</b>
N/A
<b>Evidence</b>

<b>Question</b>
<b>10.2 Are the SOE's commercial and public policy objectives publicly available?</b>
<b>Score</b>
N/A
<b>Comments</b>
N/A
<b>Evidence</b>

<b>Question</b>
<b>10.3 Is the SOE open and transparent about the composition of its board and its nomination and appointment process?</b>
<b>Score</b>
N/A
<b>Comments</b>
N/A
<b>Evidence</b>

<b>Question</b>
10.4 Is the SOE's audit committee composed of a majority of independent directors?
<b>Score</b>
N/A
<b>Comments</b>
N/A
<b>Evidence</b>

<b>Question</b>
10.5 Does the SOE have a system in place to assure itself that asset transactions follow a transparent process to ensure they accord to market value?
<b>Score</b>
N/A
<b>Comments</b>
N/A
<b>Evidence</b>

## List of Evidence &amp; Sources

No.	Type (Webpage or Document)	Name	Download Date	Link
01	Webpage	Code of Ethics Practice	11/11/19	<a href="https://ethics.rotem.co.kr/en/ethical/doctrine.asp">https://ethics.rotem.co.kr/en/ethical/doctrine.asp</a>
02	Webpage	Ethical Charter	11/11/19	<a href="https://ethics.rotem.co.kr/en/ethical/constitution.asp">https://ethics.rotem.co.kr/en/ethical/constitution.asp</a>
03	Webpage	CEO Greetings	11/11/19	<a href="https://www.hyundai-rotem.co.kr/Eng/Company/CEO.asp">https://www.hyundai-rotem.co.kr/Eng/Company/CEO.asp</a>
04	Webpage	Ethical Behaviour Q&A	11/11/19	<a href="https://ethics.rotem.co.kr/en/ethical/qna.asp">https://ethics.rotem.co.kr/en/ethical/qna.asp</a>
05	Webpage	Ethical Behaviour Guidelines	11/11/19	<a href="https://ethics.rotem.co.kr/en/ethical/gindex.asp">https://ethics.rotem.co.kr/en/ethical/gindex.asp</a>
06	Webpage	Guidelines for Employee Ethics	11/11/19	<a href="https://ethics.rotem.co.kr/en/ethical/guide.asp">https://ethics.rotem.co.kr/en/ethical/guide.asp</a>
07	Webpage	Management and Board of Directors	11/11/19	<a href="https://www.hyundai-rotem.co.kr/Eng/InvestInfo/Management/BoardDirectors.asp">https://www.hyundai-rotem.co.kr/Eng/InvestInfo/Management/BoardDirectors.asp</a>
08	Webpage	Cyber Journal - Introduction	11/11/19	<a href="https://ethics.rotem.co.kr/en/cyber/about.asp">https://ethics.rotem.co.kr/en/cyber/about.asp</a>
09	Webpage	Cyber Journal – Informant Protection Program	11/11/19	<a href="https://ethics.rotem.co.kr/en/cyber/program.asp">https://ethics.rotem.co.kr/en/cyber/program.asp</a>
10	Webpage	Reporting	11/11/19	<a href="https://ethics.rotem.co.kr/en/cyber/report.asp">https://ethics.rotem.co.kr/en/cyber/report.asp</a>
11	Webpage	Cyber Journal	11/11/19	<a href="https://ethics.rotem.co.kr/en/main/index.asp">https://ethics.rotem.co.kr/en/main/index.asp</a>
12	Webpage	Corporate Social Responsibility	12/11/19	<a href="https://www.hyundai-rotem.co.kr/Eng/Contribution/Field/Field.asp">https://www.hyundai-rotem.co.kr/Eng/Contribution/Field/Field.asp</a>
13	Webpage	Corporate Social Responsibility – Hyundai Rotem is always with you	12/11/19	<a href="https://www.hyundai-rotem.co.kr/Eng/Contribution/Site/JoinUs.asp#this">https://www.hyundai-rotem.co.kr/Eng/Contribution/Site/JoinUs.asp#this</a>
14	Webpage	Gift Management Regulations	12/11/19	<a href="https://ethics.rotem.co.kr/en/ethical/regulation.asp">https://ethics.rotem.co.kr/en/ethical/regulation.asp</a>
15	Webpage	Selection / Operation of Partner Companies	12/11/19	<a href="https://ethics.rotem.co.kr/en/accompany/guide_02.asp">https://ethics.rotem.co.kr/en/accompany/guide_02.asp</a>
16	Webpage	Internal Review Committee	12/11/19	<a href="https://ethics.rotem.co.kr/en/accompany/guide_03.asp">https://ethics.rotem.co.kr/en/accompany/guide_03.asp</a>
17	Webpage	Affiliates Introduction	12/11/19	<a href="https://www.hyundai-rotem.co.kr/Eng/Company/Family/Group_Intro.asp#this">https://www.hyundai-rotem.co.kr/Eng/Company/Family/Group_Intro.asp#this</a>
18	Webpage	Stock Status	12/11/19	<a href="https://www.hyundai-rotem.co.kr/Eng/investinfo/stock/stockholder.asp#this">https://www.hyundai-rotem.co.kr/Eng/investinfo/stock/stockholder.asp#this</a>
19	Webpage	Stock Exchange	12/11/19	<a href="https://www.bloomberg.com/profile/company/064350:KS">https://www.bloomberg.com/profile/company/064350:KS</a>
20	Webpage	Open Ownership Register	12/11/19	<a href="https://register.openownership.org/search?utf8=√&amp;q=Hyundai+Rotem+Company+Limited">https://register.openownership.org/search?utf8=√&amp;q=Hyundai+Rotem+Company+Limited</a>
21	Document	Fair Trade Compliance Manual	12/11/19	<a href="https://ethics.rotem.co.kr/_lib/download.asp?path=board&amp;downfile=%EA%B3%B5%EC%A0%95%EA%B1%B0%EB%9E%98%EC%9E%90%EC%9C%A8%EC%A4%80%EC%88%98%ED%8E%B8%EB%9E%8C%282013%EB%85%84%29%2Epdf">https://ethics.rotem.co.kr/_lib/download.asp?path=board&amp;downfile=%EA%B3%B5%EC%A0%95%EA%B1%B0%EB%9E%98%EC%9E%90%EC%9C%A8%EC%A4%80%EC%88%98%ED%8E%B8%EB%9E%8C%282013%EB%85%84%29%2Epdf</a>